## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS NORRIS,	)	
Plaintiff,	) ) 07 C 6776	
r T	)	
v.	)	
	) Judge Guzman	
CITY OF CHICAGO, et al.,	)	
	) Magistrate Judge Ashm	ıan
Defendants.	)	

## CITY OF CHICAGO'S AGREED MOTION TO EXTEND THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD

Defendants City of Chicago ("City") and Jan Arnold, by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Honorable Court grant an extension of time up to and including March 10, 2008 in which to answer or otherwise plead to Plaintiff's Complaint at Law. In support of this motion, Defendants state as follows:

- 1. On December 3, 2007, this action was filed containing claims brought pursuant to 42 U.C.S. § 1983 alleging violations of Plaintiff's constitutional rights.
- 2. On January 4, 2007, undersigned counsel filed their appearances on behalf of the City, and filed their appearances on behalf of Ms. Arnold on January 7<sup>th</sup>.
- 3. Undersigned counsel states that their clients are required to answer or otherwise plead to Plaintiff's Complaint in February (waivers of service of summons were previously executed); however, one of the below undersigned counsel will be having surgery February 9<sup>th</sup> and 10<sup>th</sup>.
  - 4. In addition, undersigned defense counsel has to examine the file, confer with their

clients and draft answers to Plaintiff's Complaint. Therefore, undersigned counsel would request until March 10, 2008 to do so in light of their schedules and the aforementioned surgeries.

- 5. Undersigned counsel has conferred with Plaintiff's counsel, Mr. Martin M. Stack, who has no objection to this request.
- 6. This motion is the Defendants' first request for an extension of time to answer or otherwise plead. Undersigned counsel respectfully submits that such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

**WHEREFORE**, Defendants City of Chicago and Jan Arnold respectfully request that they be given until March 10, 2008 to answer or otherwise plead to Plaintiff's Complaint at Law.

Respectfully submitted,

MARA S. GEORGES CORPORATION COUNSEL

BY: /s/ Ashley C. Kosztya

ASHLEY C. KOSZTYA Assistant Corporation Counsel Attorney for Defendant City & Jan Arnold

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